

Wound Care Manufacturers

July 9, 2015

Centers for Medicare and Medicaid Services
7500 Security Blvd
Baltimore, Maryland

Re: Miscellaneous Code Comments

Submitted electronically to CodingComments@cms.hhs.gov

The Coalition of Wound Care Manufacturers (“Coalition”) is submitting the following comments in response in regards to the notice CMS document “Healthcare Common Procedure Coding System (HCPCS) Codes Used for Processing Medicare Claims for Miscellaneous Durable Medical Equipment (DME).” The Coalition represents leading manufacturers of wound care products used by Medicare beneficiaries for the treatment of wounds including those products that are subject to provisions contained in this Guidance. As such we have a particular interest in this draft document and we offer our specific comments below.

While the Coalition agrees with the need to develop additional distinct HCPCS codes in order to appropriately capture items that are currently billed as “miscellaneous” items, we disagree with the process CMS is using to revise existing miscellaneous codes. This notice was not sufficiently directed at the affected community of stakeholders, and instead was merely included in a CMS “All Medicare” email weekly newsletter. Further, providing two weeks for the public to provide comments on such a proposal is simply insufficient. We would appreciate the time to be able to work in a collaborative way with CMS to develop an enhanced process for discontinuing/revising existing HCPCS codes and for the development of new, distinct codes when the demand for specific descriptions arises. In this particular case, we seek an opportunity to collaborate on the development of revised miscellaneous HCPCS codes that may impact wound care products.

Sincerely,



Marcia Nusgart R.Ph.
Executive Director.